

EXHIBIT 18

Memorandum of Activity

Case Number: I16A0120900	Office: JRI-5 Western (San Francisco)	Type of Activity: Interview
Date of Activity: 03/29/2021	Date Report Drafted: 04/01/2021	Location of Activity: 819 Bay Ave Capitola CA
Subject of Activity: Victim 3	Activity Conducted By (Name(s)): Reggie Lee	Signature: R L

On March 29, 2021, **Victim 3**, Former Skydiver, Parachute Center, Lodi, CA, was interviewed by Special Agents Reggie Lee and Richard Ficarelli, U.S. Department of Transportation, Office of Inspector General, San Francisco, CA, at Peet's Coffee, 819 Bay Ave, Capitola, CA. After being advised of the identities of the interviewing agents and the nature of the interview, **Victim 3** provided the following:

Victim 3 began skydiving in 2011 as a cameraman at Hollister, CA. He holds a U.S. Parachute Association (USPA) D-License and has accumulated approximately 5,500-6,000 jumps. **Victim 3** is currently employed as a Low Voltage Installation Manager for a security camera company.

TANDEM INSTRUCTOR COURSE

Victim 3 confirmed he attended the Tandem Instructor course with Yonghyeon Kwon (Kwon) in the summer of 2016 which was taught by Rob Pooley (Pooley).

Victim 3 had known Pooley since 2011 when Pooley was as an instructor in Hollister. **Victim 3** had attended other courses taught by Pooley in the past. Pooley's Tandem Instructor course was well known in the area to be the cheapest and it was in demand. After considering it for a while, **Victim 3** decided to get his Tandem Instructor rating to supplement his income because he was not getting much work as a cameraman at the time.

Victim 3 could not recall exactly how he registered for the course but believed it was through text message, email, or Facebook message. He received instruction from Pooley to have FAA Medical Certificate Third Class, United Parachute Technologies (UPT) application, Completed Exam, and \$1,100 in cash for the course.

On the first day of the course, **Victim 3** arrived at the Parachute Center early afternoon with the paperwork and \$1,100 in cash. Pooley took \$600 in cash and instructed **Victim 3** to give the remaining \$500 to Bill Dause (Dause) who was standing behind the counter. The remaining \$500 went to Dause for rig rentals and ten plane tickets for the jumps. A receipt was not provided by neither Pooley nor Dause. There were approximately five students in the course including Kwon, his friend, and other foreigners. **Victim 3** did not interact with Kwon or his friend during the course. Immediately after making the payment, **Victim 3** went to the packing hangar to catch up with the class who were already in place.

Pooley asked the students if they read and knew the emergency procedures to which everyone nodded. Then, Pooley instructed students to practice strapping the harness on passengers. **Victim 3** performed a rig check and everyone went out for their first jump. Pooley was strapped in front of **Victim 3** for the first tandem jump. The students conducted approximately four to five jumps on the first day which lasted until 5-6 p.m.

Dause had a videographer on the landing zone who recorded everyone landing. Dause could be a bit militant at times about skydivers following rules such as landing in a designated area. As **Victim 3** was gearing up for his third

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and fourth jump, Dause approached ^{Victim 3} and critiqued his landing. Dause told ^{Victim 3} to "flare all the way" when he was landing. This was the only feedback he received throughout the entire course.

On the second day of training, ^{Victim 3} completed the remaining five or six jumps which consisted of a solo jump with a tandem rig and other jumps with Pooley.

After the course was completed, Pooley provided the USPA and UPT paperwork to ^{Victim 3}. ^{Victim 3} noticed parts of the paperwork had been pre-filled with initials and signatures. Specifically, he noticed that the signatures were pre-signed by Y.G. When ^{Victim 3} asked Pooley about this, Pooley responded that he (Pooley) was teaching the course while Y.G. was supervising it. However, ^{Victim 3} stated Y.G. was not on-site during the course. ^{Victim 3} was not sure if other students were aware of this irregularity. After the paperwork was completed, ^{Victim 3} returned them to Pooley. ^{Victim 3} did not receive copies of the paperwork.

^{Victim 3} stated there were no classroom sessions on both training days. ^{Victim 3} could not say whether Dause knew the Tandem Instructor course was being conducted or whether Pooley and Dause interacted during the course. Dause did not teach during the course other than the time ^{Victim 3} was given feedback for landing. ^{Victim 3} felt that if Pooley quizzed all the students on emergency procedures, two people would still be alive today.

KWON'S ACCIDENT

Several weeks after completing the course, ^{Victim 3} had not received his tandem rating card in the mail. ^{Victim 3} contacted Pooley for the status of the paperwork. Pooley responded that it would be coming soon. Not too long after that conversation, Kwon and the passenger died during the fatal jump.

Following the accident, ^{Victim 3} asked Pooley if Kwon was one of the deceased to which Pooley confirmed he was. ^{Victim 3} later learned from other sources that Pooley's examiner rating had been revoked and he (Pooley) was not certified to run the course. Upon learning this, ^{Victim 3} realized immediately why his training paperwork had Y.G.'s signature pre-filled. ^{Victim 3} reached out to Pooley again to recoup the \$600 he paid to Pooley. Pooley responded there were 100 other people asking for money and to essentially wait in line.

^{Victim 3} has not been to the Parachute Center since.

^{Victim 3} agreed to check his text messages, email, and Facebook messages.

FOLLOW UP

On March 30, 2021, ^{Victim 3} stated he had zero text messages or emails from Pooley. He had one Facebook message after the accident to the effect of "Hey Rob, how about that refund?" which went unanswered.

Reviewed By (Initials): K K Date: 04/12/2021

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Rob



A USPA Coach rating



I can do the D-license and Coach Course if you need them. I don't usually do the Coach Course one on one. I'm doing one next week if you want to join. Both Coach and Tandem courses are done on weekdays so you shouldn't miss any work.

DEC 10, 2014 AT 2:45 AM

Sounds good, I have my D already, what are the days for the coach Course? I work for UPS m-f, peak volume just hit us so getting weekdays off might be a stretch. Might have to call in sick.

DEC 11, 2014 AT 9:25 AM

Hey what days are the coach course next week? How many heads are in it? How much\$?

OCT 8, 2015 AT 9:12 AM

Hey I'm in for the coach course

lemme know any prep I need to do in advance

NOV 10, 2015 AT 4:16 AM



Hey have you seen Jester around Lodi the last week or so? Someone put an MIA post up on basejumper.com and folks are worried

MAR 28, 2016 AT 6:40 AM

Hey Rob, are you having a TI rating course anytime soon?

AUG 17, 2016 AT 2:05 PM



Hey rob what's the word on that \$1100 refund?



Aa

